

KATHLEEN BLISS, ESQ. (NV Bar #7606)
Email: kb@kathleenblisslaw.com
KATHLEEN BLISS LAW, PLLC
1070 West Horizon Ridge Parkway, Suite 202
Henderson, Nevada 89012
Tele: (702) 463-9074

-and-

PAUL S. PADDA, ESQ. (NV Bar #10417)
Email: psp@paulpaddalaw.com
DAVID J. STANDER, ESQ. (*Admitted PHV*)
Email: dstanderlaw@gmail.com
PAUL PADDA LAW, PLLC
4560 South Decatur Blvd., Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888

-and-

DOUGLASS A. MITCHELL, ESQ. (NV Bar #3775)
Email: dmitchell@jenner.com
JENNER & BLOCK, LLP
1099 New York Avenue, N.W., Suite 900
Washington, D.C. 20001-4412
Tele: (202) 639-6090

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION – SAGE
MEMORIAL HOSPITAL, INC. (doing
business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO RESPOND TO
DEFENDANTS’ MOTION TO DISMISS
PLAINTIFF’S THIRD AMENDED
COMPLAINT**
(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Plaintiff additional time, to and until September 16, 2022, to respond to Defendant’s motion to dismiss (ECF No. 201) Plaintiff’s Third Amended Complaint (ECF No. 192). Presently, Plaintiff’s response to the motion to dismiss is due on September 2, 2022. This is Plaintiff’s first request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties agree to the following:

1. Good cause exists to support this request for additional time. The parties have communicated regarding the pending motion to dismiss and counsel for Plaintiff has notified counsel for Defendants that due to competing case commitments additional time is needed to properly respond to the pending motion. Counsel for Plaintiff, Paul Padda, has been tasked with drafting an initial response subject to review by his co-counsel. However, during the past week, Paul Padda has been busy with discovery matters in three other cases including having to draft an appellate brief. The additional time requested herein will permit Plaintiff’s counsel sufficient time to draft and file a response to the pending dispositive motion.

2. Counsel for the respective parties have communicated regarding this Stipulation and agree that an extension of time to and until September 16, 2022 to permit Plaintiff to file a response to the pending dispositive motion is appropriate under the circumstances.

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1 The parties respectfully request the Court approve this Stipulation.

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3 /s/ Kris Leonhardt

/s/ Paul S. Padda



4 _____
Pavneet S. Uppal, Esq.
5 Kris Leonhardt, Esq.
Jeffrey D. Winchester, Esq
6 *Counsel for all named Defendants*

Kathleen Bliss, Esq.
Paul S. Padda, Esq.
David Stander, Esq.
Douglass A. Mitchell, Esq.
*Counsel for Plaintiff,
Counterdefendant and Third-Party
Defendants*

7 Dated: September 1, 2022

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9 Dated: September 1, 2022

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11 **IT IS SO ORDERED:**

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14 **UNITED STATES**  **JUDGE**

15 **DATED:** September 1, 2022
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